

ESTTA Tracking number: **ESTTA694035**

Filing date: **09/05/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92060328
Party	Defendant Souki Manufacturing Inc.
Correspondence Address	SOUKI MANUFACTURING INC 326-6 SAKAMOTO-CHO, HODOGAYA-KU, YOKOHAMA-SHI KANAGAWA, 240-0043 JAPAN mina-csj@nifty.com
Submission	Other Motions/Papers
Filer's Name	Nobuhiko Minaki
Filer's e-mail	mina-csj@nifty.com
Signature	/N.Minaki/
Date	09/05/2015
Attachments	CCF20150905.pdf(2581632 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Plaintiff Trademark: LOVE IS FOREVER
Serial Number: 86285762
Filing Date: May 19, 2014
Refusal Issue/Mailing Date: August 27, 2014

Defendant Trademark: LOVE IS FOREVER ®
Registration No.: 3811074
Filing Date: May 13, 2009
Registration Date: June 29, 2010

Plaintiff	L.A. Gem and Jewelry Design, Inc.
Assigned Attorney	MR. MILORD A. KESHISHIAN
	Cancellation No.: 92060328
Defendant	Souki Manufacturing Inc.
No Assigned Attorney	Nobuhiko Minaki (Mr.)
	Representative Director
	Trademark Creator, Owner, User

September 05, 2015

Ref number: Souki 150901

MADAM MARY CATHERINE FAINT
Interlocutory Attorney

Dear Madam,

Amendment

in Page 24/38 of Ref number: Souki 150801 dated August 23, 2015

If it could be allowed I would like to amend in Page 24/38 of Ref number: Souki 150801 dated August 23, 2015 as follows and as attached.

Attached:

- 1) Amendment by Handwriting: 1 page
- 2) Amendment by Typewriting: 1 page

- 3) Certificate of Service 1 page
4) Receipt of Japan Post 2 pages

Very truly sincerely yours,

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive, flowing style.

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

TEL 81-45-333-4525 81-45-332-7890 direct

FAX 81-45-515-0047 E-MAIL mina-csj@nifty.com

Prosecution ↩

Proceeding by filing/putting them on the 'road'/'railway'/schedule of this prosecution, hypothetically, I think.

So, in the bottom of the heart of the assigned attorney, I can 'see' the words of plaintiff, Abandonment of this Case, hypothetically, I think.

Due to the 'Mirrors' and due to the groundlessness/powerlessness of plaintiff, it seems plaintiff has been on the 'road'/'railway'/schedule to the abandoning this case, hypothetically, I feel.

So, defendant will fully **DENY** the Motion for Default Judgment and Motion to Strike of plaintiff as follows.

And for prosperity, honor, fame if the assigned attorney could kindly/respectfully withdraw from this Motion for Default Judgment of Plaintiff, Motion to Strike, Petition to Cancel and OBSTRUCTIONS OF MY BUSINESS etc, it is highly respectful/thankful.

And this case, 92060328, being reported/petitioned as in the above etc, it should be better to return this Motion for Default Judgment etc to plaintiff, but for certainty, I would like to confirm to **DENY** etc as follows regarding each allegation alleged by plaintiff.

And for efficiency/preciseness in understanding/communication, I would like to divide the Motion of plaintiff into 13 paragraphs/portions, and regarding each paragraph/portion I would like to report/respond/petition etc as follows.

The following sentence under the title of **PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER AND AMENDED ANSWER** is the total copy of the sentence of Motion for Default Judgment of plaintiff having filed on 07/31/2015 and featured now on the Trademark Trial and Appeal Board Electronic Filing System, ESTTA Tracking number: ESTTA687104.

**PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER
AND AMENDED ANSWER**

Commissioner for Trademarks
BOX TTAB

Prosecution Proceeding by filing/putting them on the 'road'/'railway'/schedule of this prosecution, hypothetically, I think.

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And for efficiency/preciseness in understanding/communication, I would like to divide the Motion of plaintiff into 13 paragraphs/portions, and regarding each paragraph/portion I would like to report/respond/petition etc as follows.

The following sentence under the title of **PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER AND AMENDED ANSWER** is the total copy of the sentence of Motion for Default Judgment of plaintiff having filed on 07/31/2015 and featured now on the Trademark Trial and Appeal Board Electronic Filing System, ESTTA Tracking number: ESTTA687104.

**PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER
AND AMENDED ANSWER**

Commissioner for Trademarks
BOX TTAB

Certificate of Service

I hereby certify that:

- 1) a true and complete copy of:

Amendment by Handwriting: 1 page

Amendment by Typewriting: 1 page

have been served on MR. MILORD A. KESHISHIAN, Assigned Attorney for plaintiff,
MILORD & ASSOCIATES, PC

- 2) by mailing on September 05, 2015 via First Class Mail, EMS (Tracking No.:EG424722485
JP), Service of Japan Post, postage prepaid to:
- 3) MR. MILORD A. KESHISHIAN
MILORD & ASSOCIATES, PC 2049 CENTURY PARK EAST, SUITE 3850
LOS ANGELES, CA 90067, USA

Date: September 05, 2015

Signature:

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive, flowing style.

Nobuhiko Minaki

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 mina-csj@nifry.com

Receipt



8 FROM(ご依頼主)		4 受付年月日 Date mailed 2015 09 05	
Name Nobuhiko Minaki			
Address Souki Manufacturing Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa			
9 郵便番号 Postal code 240-0043 JAPAN			
7 電話番号 Telephone No. 81-45-332-7890		FAX番号 Fax No. 81-45-515-0047	
21 内容品の詳細な記載 Detailed description of contents Document Ref No.: Souki 150902		25 正味重量 Net weight 13 g	
10 内容品の個数 Number of items contained 3 pages		24 内容品の価格 Value ¥4.00	
12 上記内容品は危険物に該当しないことを確認済です。 checked that contents above are not dangerous goods.		16 この郵便物は Number of this pieces 1 番目 1 個中 Total number of pieces	
39 ご署名 Signature of the sender N. Minaki			

3 お問い合わせ番号 EMS item number EG424722485JP	
5 受付時刻 Time mailed 時(Hour) 分(Minute)	郵便料金 Postage paid
総重量 Total gross weight	合計金額 Postage paid 円 Yen
13 TO(お届け先)	
Name Mr. Milord A. Keshishian	
Address Milord & Associates, PC 2049 Century Park East, Suite 3850	
都市名 City Los Angeles CA	郵便番号 Postal code 90067
国名 Country USA	11 電話番号 Telephone number
FAX番号 Fax number	
次の場合は□に×をつけてください。 Insert a cross (x) if the item contains: <input type="checkbox"/> 贈物 a gift <input type="checkbox"/> 商品 merchandise <input type="checkbox"/> 身のまわり品 personal effects <input type="checkbox"/> 商品見本 a sample <input type="checkbox"/> その他 others <input checked="" type="checkbox"/> 書類 documents	
日本円換算合計 (円) Total value ¥4.00 Yen	



8 FROM(ご依頼主)		4 受付年月日 Date mailed 2015 09 05	
Name Nobuhiko Minaki			
Address Souki Manufacturing Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa			
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7 電話番号 Telephone No. 81-45-332-7890		FAX番号 Fax No. 81-45-515-0047	
配達状況お問い合わせ (Track & Trace) http://www.post.japanpost.jp EMSに関するお問い合わせ 0120-5931-55 (携帯電話からのお客さま) 0570-046666 (Telephone for English) 0570-046111 平日 (Mon. to Fri.) 8:00 ~ 22:00 土・日及び休日 (Sat. Sun. and holidays) 9:00 ~ 22:00			

3 お問い合わせ番号 EMS item number EG424722485JP	
EMS 受取書 (Sender's Copy) 正に受領いたしました。	
※本受取書は、領収証書ではありません。	
(日付印 Date Stamp) 	

Receipt for Postage

領収証書

毎度ありがとうございます

様

〒100-8798 日本郵便株式会社
東京都千代田区霞が関1-3-2
2015年 9月 5日 18:23

[別納2]
EMS第2A

¥1,200	69.0g 1通	¥1,200
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小 計	¥1,200
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課税計	¥0
(内消費税等	¥0)
非課税計	¥1,200

合計	¥1,200
お預り金額	¥2,000
おつり	¥800

印紙税申告納
付につき廻町
税務署承認済

担当 田中 等
発行No.6548 端04箱02
連絡先：保土ヶ谷郵便局
TEL:045-333-7423

郵便局からのお知らせ



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ください!**

「レターパックなどで現金送れ」は
全て詐欺です。

レターパックで現金を送ることは郵便法違反です。